



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

MAY 23 2012

Ref: 8EPR-N

Mr. Jim Hartman, A7400
Natural Resources Office
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

Re: Granby Pumping Plant Switchyard-Windy
Gap Substation Transmission Line Rebuild,
Grand County, Colorado
Draft Environmental Impact Statement
(CEQ#20120086)

Dear Mr. Hartman:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, et. Seq., and Section 309 of the Clean Air Act, the Region 8 Office of the Environmental Protection Agency (EPA) has reviewed the referenced Draft Environmental Impact Statement (DEIS) for the Granby Pumping Plant Switchyard-Windy Gap Substation Transmission Line Rebuild. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major federal agency action. The EPA's comments include a rating of both the environmental impact of the proposed action and the adequacy of the NEPA document.

The Western Area Power Administration (Western) is proposing to rebuild and upgrade an existing 13.6 mile, 69-kV electric transmission line originating from the Windy Gap Substation and ending at the Granby Pumping Plant Switchyard in Grand County, Colorado. The proposed project involves rebuilding and upgrading the existing single-circuit line, currently on a 30-foot right-of-way (ROW), as a double-circuit transmission line, and adding a second power transformer.

The original transmission line was built in 1935 on an H-frame wood pole line. The proposed new transmission line will incorporate a new 69-kV line as well as a new 138-kV double-circuit on a single-pole steel pole structure with concrete bases and a 100 foot ROW.

The purpose of the proposed project is to provide a reliable, second source of power to improve electrical reliability in the region, improve operating efficiency, and improve quality of service. The only secondary source of electrical power to the Grand Lake-Granby area is a cable that runs through a water diversion tunnel named the Adams Tunnel. The Adams Tunnel cable has exceeded its predicted useful life (40 years) and, upon failure, it would not be replaced.

Western's preferred alternative is to rebuild a new transmission line along the same route as the existing line (with options to use new ROWs for 1.8 miles); expand the existing ROW from 30 ft to 100 ft; install 90 foot tall steel poles in place of the 65 ft H-frame wooden poles, and remove and replace the existing 69-kV line with a new 69-kV line and an additional 138-kV line power line.

The DEIS considers four alternatives to accomplish the purpose and need for the project:

- Alternative A – This alternative would keep the existing transmission line, and therefore, serve as the no action alternative. Under this alternative, repairs and maintenance activities would still be performed; however, when the Adams Tunnel cable fails, the existing transmission line would be the only source of power for the Grand Lake-Granby area. For reliability, Western along with other electric providers would like to have a secondary power source if the first one (Adams Tunnel cable) fails.
- Alternative B1 – This alternative would rebuild and upgrade (install a new 69-kV line and a new 138-kV line) the transmission line on existing ROW with a small diversion around an existing residential area. The 1.3 mile diversion would create a new ROW just inside the Arapaho National Recreational Area. The existing ROW would be expanded from a width of 30 ft to 100 ft to accommodate requirements for construction, operation, and maintenance.
- Alternative C1 & C2 - This alternative would rebuild and upgrade the transmission line with a detour from the original ROW. The diversion would basically move the new transmission line north and west of the original ROW in order to improve scenic views and avoid residential developments. The western part of this alternative would parallel an existing ROW for the Windy Gap Water Pipeline.
- Alternative D (Options 1 and 2) – Option 1 of this alternative is the preferred alternative for the proposed project. Option 1 would share the Windy Gap Water Pipeline ROW for the western part of the transmission line rebuild and upgrade and then follow the currently existing transmission line ROW for the eastern portion of the proposed project. Option 2 would stay on the existing ROW for the first third of the improved line, and then share the Windy Gap Water Pipeline ROW to the Granby Substation location. The last part of the line would follow the currently existing line ROW. Alternative D would require a new ROW for a 1.8-mile reroute on Forest Service managed lands on the east side of Table Mountain.

General Comment:

The EPA is impressed with the thoroughness with which the DEIS document is written. The environmental impacts for each natural resource were clearly explained along with criteria to evaluate significant impacts including proposed mitigation measures for each natural/cultural resource.

Western's Standard Construction and Mitigation Practices presented in Table 2-5 as well as the project-specific environmental protection measures that are presented in Table 2-6 provide a clear picture of how environmental impacts will be avoided or mitigated. These two tables clearly state what actions will be followed to protect vegetation, wildlife, wetlands, soil resources, cultural and historic resources, paleontological resources, and visual resources.

Specific Comments:

1. Page ES-3. Section 1.4.4 lists two hydroelectric generation sources; however, the DEIS is silent on the energy source for the proposed 138-kV double-circuit line. We recommend that the DEIS identify the source of electrical power that will replace the power currently provided through the Adams Tunnel power cable.
2. As discussed in Chapter 1, Grand County is one of the fastest growing counties in Colorado, and yet the purpose and need for the project is focused primarily on the reliability of the power supply. Please address whether it is likely that a reasonable foreseeable future action will be the additional upgrading of the single-pole structures with additional transmission lines to accommodate population growth?
3. The Norton Marina is discussed in the alignment of the transmission line for the preferred alternative. Please label where the Norton Marina is located on Map 2-8.
4. Under the preferred alternative, the existing ROW north of the Granby Substation will be moved approximately 0.25 mile to the west just inside the Arapaho National Recreation Area. This new transmission line route will be within 0.25 mile of two golden eagle nests located on Table Mountain inside the Arapaho National Recreation Area. EPA recommends that Section 2.2.5 explain why the preferred transmission line route is moved approximately 0.25 mile west of the existing ROW north of the Granby Substation which brings it closer to the nesting sites on Table Mountain located in the Arapaho National Recreation Area.

Thank you for the opportunity to provide comments on the Granby Pumping Plant Switchyard-Windy Gap Substation Transmission Line Rebuild. The EPA rates this DEIS as an LO (Lack of Objections). The LO rating states that the EPA review has not identified any potential impacts requiring substantive changes to the proposal. If you have any questions or could like to discuss our comments, please contact Robert Edgar at 303-312-6669.

Sincerely,



Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation



